

Message

From: Audrey Signorelli [audrey.signorelli@pgenv.com]
Sent: 8/31/2015 5:45:19 PM
To: justin.smith@waterboards.ca.gov
CC: Dougherty, Mona@Waterboards (Mona.Dougherty@waterboards.ca.gov) [Mona.Dougherty@waterboards.ca.gov]; shin-roei.lee@waterboards.ca.gov; Mues, Pascal [Mues.Pascal@epa.gov]; Sablad, Elizabeth [Sablade.Elizabeth@epa.gov]; jim.parker@pgenv.com; Brittany Hale [brittany.hale@pgenv.com]; Permit Control [permitcontrol@pgenv.com]
Subject: TO32 CA0006700 College of the Redwoods WWTF Tentative Draft
Attachments: CA0006700_College of the Redwoods_WWTF_Tentative Draft_(8-31-15).docm; CA0006700_College of the Redwoods_WWTF_Ammonia RPA 1989 Saltwater_(8-31-15).xlsx; CA0006700_College of the Redwoods_WWTF_Chlorine Limits_(8-31-15).xlsx; CA0006700_College of the Redwoods_WWTF_Nitrate Limits_(8-31-15).xlsx; CA0006700_College of the Redwoods_WWTF_Ammonia RPA 1999 Freshwater_(8-31-15).xlsx

Justin,

Attached please find the Tentative Draft for the College of the Redwoods, Wastewater Treatment Facility (NPDES No. CA0006700). We have included a few notes throughout the draft for your consideration. Additionally, please note the following as you review the draft:

1. As we discussed Friday, the draft discontinues mass limits for BOD and TSS, establishes limits for chlorine residual based on EPA's National Ambient Water Quality Criteria for saltwater, establishes nitrate limits based on the Primary MCL, and retains the effluent monitoring frequencies for parameters with effluent limits. I have attached the limit calculations for chlorine and nitrate, as these were not included with the transmittal of the RPA.
2. As directed, the draft does not apply the 2013 freshwater criteria for ammonia, but requires a special study to determine the presence of mussels in the receiving water. The draft applies the 1989 saltwater criteria and 1999 ammonia criteria, and limits are based on the most stringent criteria (i.e., saltwater criteria). I have attached the limit calculations for the 1989 saltwater criteria and 1999 freshwater criteria, as these were not included with the transmittal of the RPA.
3. The existing permit includes an effluent limitation of 7.0 to 8.5 for pH. Table 3-1 of the Basin Plan includes water quality objectives for Humboldt Bay specifying an instantaneous maximum of 8.5 and Footnote 7 specifies that the pH shall not be depressed below natural background levels. It appears that the minimum limitation of 7.0 was an erroneous reference to the footnote. To be consistent with the Bodega Farms permit and recent draft for the City of Eureka, we revised the instantaneous minimum limit from 7.0 to 6.0 (based on the Secondary Treatment Standards).

If you have any questions regarding the draft, please let me or Brittany know.

Thank you,

Audrey Signorelli
PG Environmental, LLC
570 Herndon Parkway
Suite 500
Herndon, VA 20170
703-707-8258, ext. 104 (office)
703-707-8259 (fax)
audrey.signorelli@pgenv.com

visit our website at www.pgenv.com